

# **EXHIBIT A**

**Five-Year Calculation Using Plaintiffs' OUD Population Reduction Method:**

Population-Corrected 5-Year Costs: \$639,919,886

Less Combined County Settlements: \$639,919,886 – \$19,770,073 = \$620,149,813

Less Prescribers' Responsibility:  $\frac{\$620,149,813}{2} = \$310,074,906$

<b><u>Five-Year Market Share Allocation:</u></b>		
<u>Pharmacy</u>	<u>Lake County<sup>1</sup></u>	<u>Trumbull County</u>
Walgreens:	\$28,278,831	\$31,255,551
Walmart:	\$4,639,496	\$5,127,864

<b><u>Five-Year Red-Flag Market Share Allocation:</u></b>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$27,836,975	\$30,767,183
Walmart:	\$1,325,570	\$1,465,104

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<sup>1</sup> In these apportionment frameworks, Defendants allocate funding between the Counties to mirror the percentages going to each County in Plaintiffs revised 15-year calculations they included in their brief: 52.5% to Trumbull County and 47.5% to Lake County. *See* Dkt. 4513 at 22–23.

**Option 3: OUD Population Correction:<sup>2</sup>**

<u>Uncorrected Five-Year Costs:</u>	\$864,558,347
<u>Five-Year Corrected Plan Cost:</u>	\$346,479,168
<u>Return Half of OUD Correction:</u>	$\$346,479,168 + \$175,184,283 = \$521,663,451$
<u>Less Combined County Settlements:</u>	$\$521,663,451 - \$19,770,073 = \$501,893,378$
<u>Less Prescribers' Responsibility:</u>	$\frac{\$501,893,378}{2} = \$250,946,689$

**Option 3's Market Share Allocation:**

<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$20,910,886	\$27,270,879
Walmart:	\$3,430,692	\$4,474,129

**Option 3's Red-Flag Market Share Allocation:**

<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$20,584,153	\$26,844,771
Walmart:	\$980,198	\$1,278,322

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<sup>2</sup> Walgreen's and Walmart's Joint Abatement Phase Closing Submission included one-year and five-year calculations for Option 3: OUD Population Correction and Option 4: Eliminating Projected Costs Not Attributable to Prescription Opioids. This exhibit more accurately reflects the formula they used to arrive at those estimates and corrects a calculation error in the red-flag market share of the five-year calculation of Option 3.

**Option 4: Eliminating Projected Costs Not Attributable to Prescription Opioids:**

<u>Uncorrected Five-Year Costs:</u>	\$864,558,347
<u>Less Combined County Settlements:</u>	$\$864,558,347 - \$19,770,073 = \$844,788,274$
<u>Less 35%</u>	$\$844,788,274 - \$295,675,896 = \$549,112,378$
<u>Less Prescribers' Responsibility:</u>	$\frac{\$549,112,378}{2} = \$274,556,189$

<b><u>Option 4 Market Share Allocation:</u></b>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$22,878,218	\$29,836,570
Walmart:	\$3,753,458	\$4,895,062

<b><u>Option 4 Red-Flag Market Share Allocation:</u></b>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$22,520,746	\$29,370,374
Walmart:	\$1,072,416	\$1,398,589